

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**JANE DOE,**

**Plaintiff,**

**v.**

**Civ. No. 21-709 GBW/SCY**

**THE NEW MEXICO BOARD OF  
BAR EXAMINERS, and THE  
NATIONAL CONFERENCE OF  
BAR EXAMINERS,**

**Defendants.**

**AMENDED MOTION TO SEAL, RESTRICT, OR OTHERWISE LIMIT INSPECTION  
OF DOCUMENTS 8 AND 9 FILED WITH THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

COMES NOW Plaintiff, by and through undersigned counsels, and moves this Honorable Court to grant this Motion to Restrict and Seal Documents 8 and 9 in conjunction the PETITION FOR PERMISSION TO FILE ANONYMOUSLY. Pursuant to Fed. R.Civ.P.5.2(e), for good cause shown the Court may limit or prohibit a non-party's remote electronic access to a document filed with the court.

The Plaintiff humbly requests that this Court issue an Order directing that previously submitted Documents Numbers 8 and 9 be sealed in conjunction with the PETITION FOR PERMISSION TO FILE ANONYMOUSLY and MOTION TO SEAL, RESTRICT, OR OTHERWISE LIMIT INSPECTION OF THE PETITION FOR PERMISSION TO FILE ANONYMOUSLY WITH THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO and states the following in support thereof:

1. Zangara Law Office, P.A. submitted Documents 8 and 9 unbeknownst to the Plaintiff and her current attorneys of record Lisa Cleveland, Esq. and Chandler Blair, Esq. until 17<sup>th</sup> of August 2021.
2. Both documents contain the Plaintiff's contact information and personal identifier information.
3. The client confidentiality agreement inclusive of services for Association between Zangara Law Office, PA. and the Plaintiff contained the Plaintiff's request that the contact, medical, and personal identifier information be omitted from documents submitted to the court.
4. The Plaintiff's request was omitted in Documents 8 and 9. Consequently, the Plaintiff respectfully requests to remain anonymous in all court documents because the subject matter of the case regards currently concealed highly sensitive and medically confidential records protected under federal laws, per the Americans with Disabilities Act (ADA), Health Insurance Portability and Accountability Act of 1996 (HIPPA), and 42 U.S.C. § 12101; 12102.

Thus, the existence of an overriding interest that overcomes the right of public access to the Court records is present, so the Plaintiff seeks to use the pseudonym Jane Doe in the first instance, or the initial of her first and last name in the second instance, to remain in confidence and to have her ADA and HIPPA privacy rights complied with under federal law.

This request to conceal personal identifiers with respect to the Plaintiff's federally protected health records can help eradicate additional disability and employment discrimination against the Plaintiff now and in the future.

Date: August 28, 2021

Respectfully submitted,

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*and*

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*Counsels for the Plaintiff*

**Certificate of Service:** I, the undersigned, hereby certify that a copy of the foregoing was delivered electronically to counsels of record via the EC/CMF system on the date of filing.

/S/ Chandler C. Blair  
Chandler C. Blair, Esq.

/S/ Lisa S. Cleveland  
Lisa S. Cleveland, Esq.